

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

NEW YORK, NY

CHICAGO, IL

STAMFORD, CT

PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES

MUMBAI, INDIA

FACSIMILE

(202) 342-8451

www.kelleydrye.com

(202) 342-8400

DENISE N. SMITH

DIRECT LINE: (202) 342-8614

EMAIL: dsmith@kelleydrye.com

March 1, 2016

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Annual Customer Proprietary Network Information Compliance
Certification; EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of BTS Global, LLC ("BTS Global") and pursuant to 47 C.F.R. § 64.2009(e), attached please find BTS Global's 2016 Annual Customer Proprietary Network Information Compliance Certification covering calendar year 2015.

Please contact the undersigned at (202) 342-8614 if you have any questions regarding this filing.

Respectfully Submitted,



Denise N. Smith

Counsel to BTS Global, LLC

Annual Customer Proprietary Network Information Certification
Pursuant to 47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015

Name of Company: BTS Global, LLC

Form 499 Filer ID: 829163

Name of Signatory: Jorge Asecio

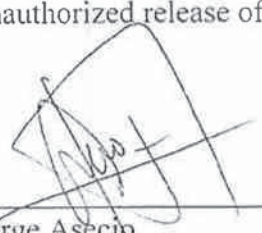
Title of Signatory: Managing Director

I, Jorge Asecio, certify that I am an officer of BTS Global, LLC ("BTS Global" or the "Company"), and acting as an agent of BTS Global, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's ("FCC") Customer Proprietary Network Information ("CPNI") rules. *See* 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how BTS Global's procedures ensure the Company is in compliance with the requirements set forth in sections 64.2001 et seq. of the Commission's rules. *See* 47 C.F.R. § 64.2009(e).

BTS Global has not taken any actions (instituted proceedings or filed petitions at either state commissions, the court system, or at the FCC) against data brokers in the past year. BTS Global has no information outside of Commission Docket No. 96-115, or that is not otherwise publicly available (e.g., through news media), regarding the processes pretexters are using to attempt to access CPNI. The steps the Company has taken to protect CPNI include updating its CPNI practices and procedures and conducting new training designed to ensure compliance with the Commission's modified CPNI rules.

BTS Global has not received any customer complaints in the past year concerning the unauthorized release of CPNI.



Jorge Asecio
Managing Director
BTS Global, LLC

Date: Feb-27-2016

STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION

1. It is BTS Global, LLC's ("BTS Global" or the "Company") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by the company to the customer. If the Company is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, the Company will first obtain the customer's consent prior to using CPNI.
2. BTS Global takes reasonable measures to prevent unauthorized access to CPNI by a person other than the subscriber or BTS Global. However, BTS Global cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - A. If an unauthorized disclosure were to occur, BTS Global shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - B. BTS Global shall wait an additional seven (7) days from its government notice prior to notifying customers of the breach.
 - C. Notwithstanding the provisions in subparagraph B above, BTS Global shall not wait the additional seven (7) days to notify its customers if BTS Global determines there is a risk of immediate and irreparable harm to the customers.
 - D. BTS Global shall maintain records of discovered breaches for a period of at least two (2) years.
3. All employees will be trained as to when they are, and are not, authorized to use CPNI upon commencement of employment with the Company and annually thereafter.
 - A. Specifically, BTS Global shall prohibit its personnel from disclosing call detail information based upon a customer-initiated telephone call except under the following four (4) circumstances:
 - When the customer has pre-established a password;
 - When the information requested by the customer is to be sent to the customer's address of record;
 - When BTS Global calls the customer's telephone number of record and discusses the information with the party initially identified by the customer when service was initiated; or
 - When the customer is able to provide call detail information without assistance.
 - B. BTS Global may use CPNI for the following purposes:
 - To initiate, render, maintain, repair, bill and collect for services;

- To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - To provide inbound telemarketing, referral or administrative services to the customer during a customer initialed call and with the customer's informed consent;
 - To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - To market services formerly known as adjunct-to-basic services; and
 - To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
4. Except for disclosure to third parties in connection with the activities described in paragraph 3(b), prior to allowing access to Customers' individually identifiable CPNI to BTS Global's joint ventures or independent contractors, BTS Global will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, BTS Global requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
5. BTS Global requires express written authorization from the customer prior to disclosing CPNI to new carriers, except as otherwise required by law.
6. BTS Global does not disclose CPNI information to any third party for marketing purposes. To the extent that BTS Global provides any third party with access to CPNI, such as for the provisioning of service to customers or for customer inquiry, BTS Global has in place procedures to protect the confidentiality of the information disclosed to the third party.
7. BTS Global maintains a record of its own and its affiliates' sales and marketing campaigns that use BTS Global's customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign.
- A. Prior to commencement of a sales or marketing campaign that utilizes CPNI, BTS Global establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by BTS Global:
- Prior to any solicitation for customer approval, BTS Global will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI.
 - BTS Global will obtain approval via either opt-in or opt-out means, as permitted by FCC rules, for any instance in which BTS Global must obtain customer approval prior to using, disclosing, or permitting access to CPNI. A

customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval.

- Records of approvals are maintained for at least one year. BTS Global provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
 - The content of BTS Global's CPNI notices comply with FCC Rule 64.2008(e).
8. BTS Global has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
 9. BTS Global has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, BTS Global's sales personnel will obtain express supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.
 10. BTS Global notifies customers immediately of any account changes, including password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record.
 11. BTS Global may negotiate alternative authentication procedures for services that BTS Global provides to business customers that have a dedicated account representative and a contract that specifically addresses BTS Global's protection of CPNI.
 12. BTS Global is prepared to provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumer's inability to opt-out is more than an anomaly.